

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HEALTHCARE SERVICES GROUP, INC.,

Plaintiff,

v.

SKYLINE SERVICES GROUP, LLC, et al.

Defendants.

Civil Action No. 17-2703

MOTION FOR DEFAULT JUDGMENT

Plaintiff Healthcare Services Group, Inc. (“Plaintiff”) requests the Court enter default Judgment against the Defendants pursuant to Federal Rules of Civil Procedure 16(f), 37, and 55¹, and the Court’s inherent authority. In support thereof, Plaintiff avers the following:

1. Defendants have repeatedly demonstrated their refusal to participate in the litigation of this action, substantially prejudicing Plaintiff’s ability to proceed with its claims.
2. As a result of Defendants’ refusal to comply with discovery obligations and repeated failure to appear at hearings and court conferences in direct violation of Court Orders, the Court should enter default judgment against Defendants.
3. Plaintiff incorporates its brief in support of its Motion for Default Judgment, which includes the full grounds to support Plaintiff’s request.

¹ To the extent the Court relies on Rule 55, Plaintiff requests the Court direct the Clerk of Court to enter a default in advance of entering a default judgment.

WHEREFORE, the Plaintiff Healthcare Services Group, Inc. requests the Court enter Default Judgment against Defendants.

Respectfully submitted,

STEVENS & LEE, P.C.

Dated: March 4, 2019

/s/ Elizabeth A. Ware

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